

**McMANIMON, SCOTLAND & BAUMANN, LLC**

75 Livingston Avenue, Suite 201

Roseland, New Jersey 07068

(973) 622-1800

Anthony Sodono, III, Esq. ([asodono@msbnj.com](mailto:asodono@msbnj.com))

Sari B. Placona, Esq. ([splacona@msbnj.com](mailto:splacona@msbnj.com))

*Attorneys for Anthony Sodono, III, Temporary Receiver*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., a New  
Jersey corporation, d/b/a “My Forex Funds”;  
TRADERS GLOBAL GROUP INC., a Canadian  
business organization; and MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808-ZNQ-TJB

**CERTIFICATION OF ANTHONY SODONO, III, THE TEMPORARY  
RECEIVER, IN SUPPORT OF HIS APPLICATION FOR  
AUTHORIZATION TO EMPLOY PROFESSIONALS: (I) McMANIMON,  
SCOTLAND & BAUMANN, LLC, AS COUNSEL; AND (II) EISNER  
ADVISORY GROUP LLC AS ACCOUNTANTS**

**ANTHONY SODONO, III**, of full age, hereby certifies, pursuant to 28 U.S.C. § 1746,  
as follows:

1. I am an attorney at law duly admitted to practice before this Court. I am a member with the law firm of McManimon, Scotland & Baumann, LLC (“MS&B”), which maintains offices for the practice of law at 75 Livingston Avenue, Suite 201, Roseland, New Jersey 07068.

2. On August 29, 2023, I was appointed Temporary Receiver (“Temporary Receiver”) for Traders Global Group Inc., a New Jersey corporation, d/b/a “My Forex Funds”; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi (the

“Receivership Defendants”). See Docket No. 13.

3. This certification is submitted in connection with the proposed retention of MS&B as counsel for the Temporary Receiver, and Eisner Advisory Group LLC (“Eisner”) as Accountants for the Temporary Receiver. See Docket No. 27.

4. Neither I, MS&B or Eisner, nor any member thereof insofar as I, after due inquiry, have been able to ascertain, is or has been a creditor, an equity security holder, an insider of the Receivership Defendants, or has any other relationship with the Receivership Defendants or their agents, creditors, or other parties in interest, or their respective attorneys. Moreover, MS&B and Eisner claim no interest in the suit or any of the parties thereto in any way which would disqualify them from serving the Temporary Receiver in good faith as a fiduciary for all of the beneficial owners and creditors of the estate, as contemplated by L. Civ. R. 66.1(g) of the Local Civil Rules of the United States District Court for the District of New Jersey.

5. Neither I, MS&B or Eisner, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, is or has been, a director, officer or employee of the Receivership Defendants.

6. Neither I, MS&B or Eisner, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, has an interest materially adverse to the interests of the Receivership Defendants or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Temporary Receiver or the Receivership Defendants.

7. Neither I, MS&B or Eisner, nor any member thereof, insofar as I, after due inquiry, have been able to ascertain, holds or represents any interest materially adverse to the Temporary Receiver or the Receivership Defendants in the matters upon which MS&B is to be

engaged.

8. Neither I, MS&B or Eisner, nor any member thereof, will, upon being retained, represent any other entity having an adverse interest in connection with this case.

9. It is necessary for me to retain MS&B as my counsel to assist in handling this matter.

10. MS&B possesses the requisite expertise in the fields of, among other things, litigation, general corporate, receiverships, reorganization insolvency, bankruptcy, and related matters.

11. It is expected that this matter will require multiple attorneys from MS&B to handle the following:

- a. communicating with Defendants' counsel;
- b. working in conjunction with the Plaintiff to prosecute this matter;
- c. asset recovery;
- d. communicate with multiple banking institutions;
- e. any potential litigation or motion practice filed in this case;
- f. communicating with over 135,000 potentially defrauded individual; and
- g. any other services requested.

2. It is necessary for me to retain Eisner as my accountant to handle the following:

- a. Review of available financial records; if necessary, locate and retrieve most important documents and relocate to a storage facility;
- b. assist with preservation of accounting systems, IT records, and related data;
- c. update internal financial records;

- d. assist in forensic review of Receivership Defendants' records including a review for potential preferences and/or fraudulent conveyances;
- e. preparation of all required federal and state corporate tax returns if requested;
- f. assist in other tax matters if requested; and
- g. perform other services as requested by the Temporary Receiver.

I certify under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information, and belief.

Dated: September 21, 2023

/s/ Anthony Sodono, III  
Anthony Sodono, III